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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

IRMA AGUIRRE, an individual,

Plaintiff,

vs.

MUNDO, LLC, a Nevada Limited Liability
Company; ALIEN TEQUILA SPIRITS
COMPANY, LLC, a Nevada Limited Liability
Company; GEORGE HARRIS, an individual;
DOES I through X; and ROE BUSINESS
ENTITIES I through X, inclusive,

Defendant.

CASE NO.: 2:13-cv-01957-LDG-NJK

STIPULATION AND
ORDER

COME NOW Plaintiff, IRMA AGUIRRE (“Plaintiff”) and Defendants, MUNDO,
LLC, a Nevada Limited Liability Company, ALIEN TEQUILA SPIRITS COMPANY, LLC,

1 a Nevada Limited Liability Company, and GEORGE HARRIS, an individual (“Defendants”)
2 and hereby stipulate and agree to extend the settlement dates as follows:

3 On August 4, 2015, a Settlement Conference was held in this matter, and a
4 settlement was reached.

5 On August 20, 2015, a confidential settlement agreement was entered into by
6 Plaintiff and Defendants.

7 The terms of the confidential settlement agreement required the settlement funds to
8 be paid by August 31, 2015, and further required the parties to file a stipulation of dismissal
9 by September 1, 2015.

10 In the interim, the Internal Revenue Service filed a Notice of Levy with the Court,
11 which was forwarded to Plaintiff and Defendants.

12 On August 28, 2015, a hearing was held where Plaintiff, Defendants, and the United
13 States appeared before the Court. At that hearing the Court expressed concerns with a
14 previously filed stipulation and the prospect of a possible related interpleader action.

15 Following that hearing, Plaintiff and Defendants both conferred with the Internal
16 Revenue Service, and an agreeable resolution has been reached between Plaintiff,
17 Defendants, and the Internal Revenue Service with regard to how settlement funds in this
18 matter shall be distributed and the levy that has been filed. However, the resolution could not
19 be accomplished within the previously scheduled deadlines.

20 Therefore, Plaintiff and Defendants request that the Court extend the deadlines
21 previously entered in this matter by three weeks, which will allow Plaintiff and Defendants
22 to complete required filings and disbursement of settlement funds as agreed.

23 Accordingly, it is hereby stipulated and agreed to by and between Plaintiff and
24 Defendants that:

- 25 1. The deadline for disbursement of settlement funds to counsel for Plaintiff shall
26 be **five (5) business days from the IRS’s lifting of its levy.**

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2. The deadline for the parties to file a stipulation of dismissal shall be **five (5) business days from the disbursement of all settlement funds.**

DATED this 1st day of September, 2015.

MCLEATCHIE SHELL LLC

MORRIS POLICH & PURDY LLP

/s/ Margaret A. McLetchie
MARGARET A. MCLEATCHIE
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Attorney for Plaintiff

/s/ Deanna L. Forbush, Esq.
DEANNA L. FORBUSH, ESQ.
Nevada State Bar No. 6646
Attorney for Defendants

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE
LLOYD D. GEORGE

Dated this 4 day of September, 2015.